

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

**ALYSSON MILLS, IN HER CAPACITY  
AS RECEIVER FOR ARTHUR LAMAR  
ADAMS AND MADISON TIMBER  
PROPERTIES, LLC**

**PLAINTIFF**

**vs.**

**CASE NO. 3:18-cv-866-CWR-FKB**

**BUTLER SNOW LLP; BUTLER SNOW  
ADVISORY SERVICES, LLC; MATT  
THORNTON; BAKER, DONELSON,  
BEARMAN, CALDWELL & BERKOWITZ  
PC; ALEXANDER SEAWRIGHT, LLC;  
BRENT ALEXANDER; and JON  
SEAWRIGHT**

**DEFENDANTS**

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**MOTION TO DISMISS CLAIMS AGAINST ALEXANDER SEAWRIGHT, LLC,  
BRENT ALEXANDER, AND JON SEAWRIGHT**

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Pursuant to Federal Rule of Civil Procedure 12(b)(6), and for the reasons set forth in their Memorandum in Support of this Motion to Dismiss, Defendants Alexander Seawright, LLC, Brent Alexander, and Jon Seawright move the Court to dismiss with prejudice Counts I, II, III, V, and VI of the Receiver's Complaint, as well as the Receiver's demand for declaratory judgment of personal liability against Brent Alexander and Jon Seawright.

Date: March 6, 2019.

Respectfully submitted,

**ALEXANDER SEAWRIGHT, LLC; BRENT  
ALEXANDER; and JON SEAWRIGHT**

By: /s/ R. David Kaufman  
R. David Kaufman  
One of Their Attorneys

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*Counsel for Defendants Alexander Seawright, LLC,  
Brent Alexander, and Jon Seawright*

**CERTIFICATE OF SERVICE**

I, R. David Kaufman, hereby certify that on March 6, 2019, I caused the foregoing pleading to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record and registered participants.

/s/ R. David Kaufman  
R. David Kaufman